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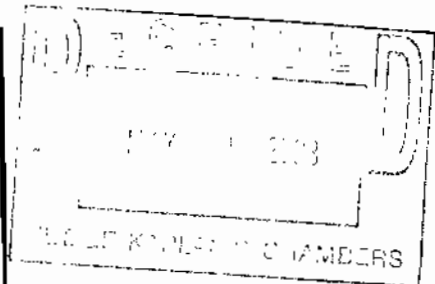
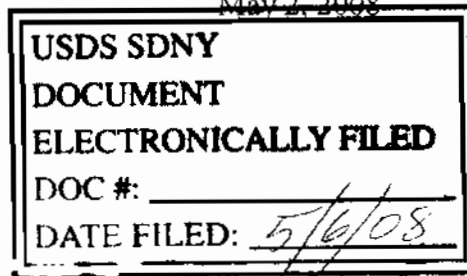
MEMO ENDORSED

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By Hand
Hon. Lewis A. Kaplan
United States District Court
500 Pearl Street
New York, NY 10007



Re: LB Arts SPRL v. Neuhooff, 08 CV 3726 (LAK)

Dear Judge Kaplan:

I ask that the time of defendants other than Neuhooff-Edelman Gallery, LLC be extended thirty days, to June 11, 2008, from the present due date of May 12, pursuant to Fed. R. Civ. P. 6(b)(1)(A). I have been engaged by the defendants requesting this extension only for the purpose of seeking the extension. I have been told that Neuhooff-Edelman is in a liquidation and that a trustee is appointed. I do not represent Neuhooff-Edelman. No other extensions have been sought.

I asked plaintiff's counsel Ted Semaya for his consent. Mr. Semaya refused, stating he would not consider the extension unless he received a "serious settlement proposal" by May 5. Only if he liked our offer "would [he] execute the stipulation and return it . . . for filing."

The twenty-seven page RICO complaint, seeking millions of dollars, attaches as exhibits the complaints in two other actions. Whoever defendants retain as counsel will require time to review the complaint and to prepare a motion or an answer. The amount of time defendants seek is consistent with the nature and gravity of plaintiff's allegations.

I also ask that the action be referred to the court's mediation program immediately, for quick assignment to a volunteer mediator, with mediation to follow immediately upon assignment. Based on my prior involvement in this matter, I believe plaintiffs have been paid in full and, in addition, have received monies that, in aggregate, exceed nine percent simple interest, to the date of payment, on each purported late paid invoice. Given Mr. Semaya's interest in an early settlement offer, settlement discussions before a mediator, or a magistrate judge, may be the most expeditious way to bring this action to a close.

Respectfully yours,

Lawrence A. Steckman

cc (by e-mail):
Ted G. Semaya, Esq.
Joseph T. Johnson, III, Esq.

101.5444.574-6206

The time of defendants other than Neuhooff-Edelman to answer or move is extended to 6/11/08

LEWIS A. KAPLAN, USDC

5/6/08